

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA )  
v. )  
BENJAMIN SHACAR, )  
Defendant. )  
CRIMINAL NO. 21-CR-30028-MGM

**DEFENDANT'S MOTION TO FILE EXHIBITS TO MOTION  
TO COMPEL DISCOVERY UNDER SEAL**

Now comes the defendant Benjamin Shacar and requests that the Court allow the defendant to file Exhibits A, B, D, F, H, I, M, N, and O to his Motion to Compel Discovery dated March 4, 2024, under seal.

In support of this motion, the defendant states that some of the content contained in these exhibits would be protected under ¶3 of the protective order approved by Magistrate Judge Robertson in this case on July 14, 2021. [Dkt. 25].

Respectfully submitted,

BENJAMIN SHACAR

/s/ William J. O'Neil  
**WILLIAM J. O'NEIL**  
Attorney for the Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date March 4, 2024.

/s/ William J. O'Neil  
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